

SEALED

UNITED STATES DISTRICT COURT

FILED

for the

Northern District of Texas

June 2, 2020KAREN MITCHELL
CLERK, U.S. DISTRICT COURT

United States of America)

v.)

JaCorey Nathaniel Anderson)

Case No. 3:20-MJ-542-BT)

*Defendant(s)***CRIMINAL COMPLAINT**

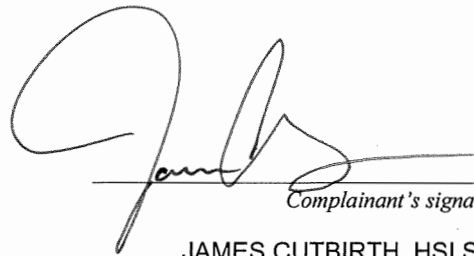
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 24 to May 30, 2020, in the county of Dallas in the
Northern District of Texas, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. §§ 1594, 1591(a) & (b)(2) Attempted Child Sex Trafficking

This criminal complaint is based on these facts:

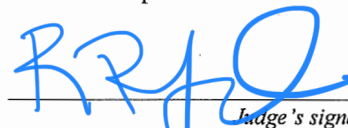
See attached affidavit of HSI Special Agent James Cutbirth.

☒ Continued on the attached sheet.*Complainant's signature*

JAMES CUTBIRTH, HSI Special Agent

Printed name and title

Agent sworn and signature confirmed before me via reliable electronic means pursuant to Fed. R. Crim. P. 4.1.

Date: June 2, 2020*Judge's signature*City and state: Dallas, TexasREBECCA RUTHERFORD, U.S. MAGISTRATE
JUDGE*Printed name and title*

**AFFIDAVIT IN SUPPORT OF
APPLICATION FOR CRIMINAL COMPLAINT**

I, James Cutbirth, a Special Agent with U.S. Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), being first duly sworn, state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Department of Homeland Security, ICE/HSI, in Dallas, Texas assigned to the North Texas Trafficking Task Force (NTTTF). I have been a criminal investigator for approximately 4 years. I have received training from the Federal Law Enforcement Training Center (FLETC) and have been the lead investigator for various investigations across multiple disciplines. As a law enforcement officer, I have used a variety of methods to investigate criminal activity including, but not limited to, visual surveillance, witness interviews, the use of search warrants and confidential informants. I have been the Affiant for and have participated in the execution of numerous search warrants and arrest warrants.

2. In preparation for this affidavit, I have discussed the facts of this case with other law enforcement agents/officers within HSI and the NTTTF. The information contained in this affidavit is based on my personal knowledge, information I received from other law enforcement agents assisting in this investigation, and what I have learned from the other sources specifically discussed herein. Because this affidavit is being

submitted for the limited purpose of securing a criminal complaint, I have not included every fact known to me concerning this investigation.

3. This affidavit sets forth facts and suggests reasonable inferences from those facts, establishing that there is probable cause to believe that between April 24, 2020, and May 30, 2020 in the Dallas Division of the Northern District of Texas and elsewhere, **JaCorey Nathaniel ANDERSON** committed the offense of Attempted Child Sex Trafficking in violation of 18 U.S.C. §§ 1594(a), 1591(a) & (b)(2).

PROBABLE CAUSE

4. HSI Special Agents currently assigned to the NTTTTF initiated a proactive operation targeting human traffickers who exploit social media websites to recruit juvenile victims to engage in commercial sex acts.

5. Between April 24, 2020, and May 30, 2020, **ANDERSON** engaged with HSI undercover agents (UCAs) representing themselves as a juvenile female. **ANDERSON** communicated with the UCAs utilizing cellular telephone number 832-561-2574¹ and via social media “Website A”² utilizing username “**slandokareem**.”

POSITIVE IDENTIFICATION OF ANDERSON

6. **ANDERSON** utilized username “**slandokareem**” on Website A to communicate with the UCA. The account page associated with the username

¹ Queries within electronic databases reveal that the number 832-561-2574 is linked to **ANDERSON**.

² I know the name of the social media platform Website A, but in the interest of protecting ongoing investigations involving this website I do not list it here.

“slandokareem” contained multiple photographs depicting **ANDERSON**. HSI Special Agents compared photographs from Website A with those drawn from Department of Motor Vehicles databases and confirmed a positive match.



COMMUNICATIONS BETWEEN ANDERSON AND UCAs

7. Communications between **ANDERSON** and UCAs have been summarized and organized below for clarity. All definitions and interpretations are based on my training and experience as a law enforcement agent.

8. On April 24, 2020, **ANDERSON** initiated communications with the UCA. The following is a summary of the communications conducted via a messaging application within Website A and does not include every word exchanged.

Participant Name	Date	Message
slandokareem	4/24/2020	What city you in
slandokareem	4/24/2020	I kno you not spoken for but you look pretty and with a simple conversation we can get acquainted with each other
slandokareem	4/24/2020	I'm not fenna sell you a dream and bullshit stories but I wanna see your worth
UCA	4/24/2020	I thought u was a rapper from ur page
slandokareem	4/24/2020	Well I'm more than that just like I believe some hoes ³ are more than hoes

ANDERSON initiated communications with the UCA. **ANDERSON** told the UCA he knew the UCA was "*not spoken for*," meaning under the control of another trafficker.

The UCA sought to confirm **ANDERSON**'s status as a human trafficker, telling

³ "Hoe" is a common term within the human trafficking subculture used to refer to women who engage in the sale of commercial sex.

ANDERSON “*I thought u was a rapper from ur page.*” **ANDERSON** told the UCA he was more than a rapper, just as “*some hoes are more than hoes.*”

9. On April 24, 2020, **ANDERSON** continued to communicate with the UCA. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
Slandokareem	4/24/2020	Send me your number so we can get connected
UCA	4/24/2020	214-833-9356
Slandokareem	4/24/2020	I texted you

In this exchange, **ANDERSON** requested the UCA’s telephone number. The UCA provided **ANDERSON** with an HSI recorded telephone number. **ANDERSON** told the UCA he sent a text message to the HSI recorded telephone number.

TEXT MESSAGES EXCHANGED OVER CELLULAR NETWORK

10. On April 24, 2020, **ANDERSON** initiated communications with the UCA via text messages from cellular telephone number 832-561-2574. The text messages exchanged were sent by **ANDERSON** to an HSI recorded telephone number. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
ANDERSON	4/24/2020	KyReem 👑
ANDERSON	4/24/2020	Slando Kareem
ANDERSON	4/24/2020	Send me some better pictures to see how you look like

In this exchange, **ANDERSON** text messaged the UCA and used the “crown” emoji.

This is a common symbol within the human trafficking subculture used to symbolize a pimp or trafficker. **ANDERSON** positively identified himself by referencing the username featured on his profile on Website A. **ANDERSON** also requested pictures of the UCA.

CONTINUED COMMUNICATIONS BETWEEN ANDERSON AND UCAs

11. On April 26 and 27, 2020, **ANDERSON** communicated with the UCA.

The following is a summary of the communications conducted via a messaging application within Website A and does not include every word exchanged.

Participant Name	Date	Message
slandokareem	4/26/2020	Just tryna check on your status
slandokareem	4/27/2020and I'm waiting you
UCA	4/27/2020	Wut u waiting on
slandokareem	4/27/2020	You suppose to be getting yourself together and back at it

UCA	4/27/2020	I don't kno wtf ⁴ u sayin rn ⁵
slandokareem	4/27/2020	Why you not getting no money right now
slandokareem	4/27/2020	I don't talk reckless through on the internet so I watch what I say


In this exchange, **ANDERSON** told the UCA he had been “*waiting*” on him/her. The UCA asked for clarification, and **ANDERSON** told the UCA he/she should be getting “*back at it.*” Based on my training and experience, **ANDERSON** was using coded language to ask when the UCA was going to be selling commercial sex. The UCA again asked **ANDERSON** for clarification. **ANDERSON** asked the UCA why he/she was not “getting no money right now. Based on my training and experience, **ANDERSON** was using coded language to ask why the UCA was not currently earning commercial sex proceeds. **ANDERSON** informed the UCA that he is careful about the way he communicates “*on the internet.*”

12. On April 28, 2020, **ANDERSON** continued to communicate with the UCA. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
slandokareem	4/28/2020	When a hoe give me that

⁴ “WTF” is an abbreviation for “What the fuck?”

⁵ “RN” is an abbreviation for “right now.”

		 money and loyalty she can't go wrong
slandokareem	4/28/2020	I'm not a 16 ⁶ I'm a god ima real daddy ⁷ not a Bullshit pimp it's a difference and It's not about having a plan I am the plan I am your way to new change in your life. Not beating ya ass taking ya money and not investing you fixing your life piece by piece step by step. I tell every bitch that ever choose up ⁸ with me that if I'm not changing your life then you can blow on me n leave
UCA	4/28/2020	That sounds bad ass
slandokareem	4/28/2020	Fuck the sound it's reality
slandokareem	4/28/2020	So you let me know when you got the fee ⁹ and ready to be one

⁶ "16" is a common term within the human trafficking subculture used to refer to a pimp. The "16" refers to the sixteenth letter of the alphabet "P."

⁷ "Daddy" is a common term within the human trafficking subculture used to refer to a pimp or trafficker.

⁸ "Choose up" is a common term within the human trafficking subculture used to refer to when a female human trafficking victim "chooses up" to a new trafficker or pimp.

⁹ "Fee" is a common term within the human trafficking subculture used to refer to a "choosing fee." This fee is paid by human trafficking victims to their trafficker or pimp to join their human trafficking organization.

In this exchange, **ANDERSON** told the UCA that when a “hoe” gives her “money” to him, she “*can’t go wrong.*” **ANDERSON** drew a contrast between himself and a “*bullshit pimp.*” **ANDERSON** told the UCA he was a “*real daddy*” and a “*god.*” **ANDERSON** told the UCA he tells “*every bitch that every choose up with me that if I’m not changing your life then you can blow on me and leave.*” **ANDERSON** told the UCA to let him know when he/she had the entrance fee to join his human trafficking organization (HTO).

13. On May 8, 2020, **ANDERSON** continued to communicate with the UCA. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
slandokareem	5/8/2020	How old r u?
UCA	5/8/2020	16 almost 17
slandokareem	5/8/2020	No you not
UCA	5/8/2020	I never lie about my age
slandokareem	5/8/2020	Send me some pictures I gotta see this
slandokareem	5/8/2020	You good I got you
slandokareem	5/8/2020	So you be walking the blade ¹⁰ ?
UCA	5/8/2020	Wuts ur fee

¹⁰ “Blade” is a common term within the human trafficking subculture used to refer to an area where women walk to display themselves while selling commercial sex. This is commonly along a road.

Slandokareem	5/8/2020	5
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In this exchange, **ANDERSON** directly asked the UCA his/her age. The UCA told **ANDERSON** he/she was sixteen years old. **ANDERSON** asked for pictures of the UCA. **ANDERSON** signaled his understanding of the UCA's age and confirmed he wanted the UCA to join his HTO when he said, "*you good I got you.*" **ANDERSON** asked the UCA if he/she previously sold commercial sex on "*the blade.*" The UCA asked **ANDERSON** what fee he required to join his HTO. **ANDERSON** told the UCA five thousand dollars.

14. On May 11, 2020, **ANDERSON** continued to communicate with the UCA. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
slandokareem	5/11/2020	When you turn 17
UCA	5/11/2020	August 30
slandokareem	5/11/2020	Lol damn ok that's close
slandokareem	5/11/2020	You got your social and birth certificate so you can get your id?
UCA	5/11/2020	I can't use my real ID cuz I need it to say I'm 18
slandokareem	5/11/2020	I know what I'm doing it's gonna have your real name and real everything except the date of birth will be

		different
slandokareem	5/11/2020	You up my instruction now I'm your daddy n nothing else get prepared for it
slandokareem	5/11/2020	Do we have an understanding?
UCA	5/11/2020	Yea
slandokareem	5/11/2020	The correct term is yes daddy
slandokareem	5/11/2020	Send me a picture of your birth certificate so I can work on the id
slandokareem	5/11/2020	Do you know how to dance if I was to put you in a strip club?
UCA	5/11/2020	I ain't never danced in a club b4 I was afraid they would check my ID and I would get in trouble

Three times during the above conversation, the UCA confirmed his/her status as a juvenile. **ANDERSON** directly asked when the UCA turned seventeen and the UCA confirmed it was three months away. When **ANDERSON** asked for genuine identification documents to aid him in acquiring a false identification document for the UCA, the UCA clarified with **ANDERSON** that he/she could not use a legitimate identification document because the UCA was a juvenile. When **ANDERSON** asked if the UCA previously stripped in a club the UCA reminded **ANDERSON** he/she was not old enough to get into a strip club. **ANDERSON** demonstrated the UCA was under his authority when he as the UCA if they had “*an understanding.*” **ANDERSON** then

chastised the UCA for answering him “*yea*” and told him/her the correct way to address him is “*daddy*.”

15. On May 11 and 12th, 2020, **ANDERSON** continued to communicate with the UCA. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
UCA	5/11/2020	U going to post the ads?
slandokareem	5/11/2020	Yea of course...
slandokareem	5/11/2020	Send me the pictures n shit
slandokareem	5/11/2020	I need a phone number and some more shit from you
slandokareem	5/11/2020	Text me the shit then instead of here
UCA	5/12/2020	2149494483

In this exchange, the UCA asked **ANDERSON** if he was going to post the commercial sex advertisements online and **ANDERSON** affirmed he would. **ANDERSON** instructed the UCA to send him pictures to use in the commercial sex advertisements. **ANDERSON** told the UCA he needed his/her cellular telephone number. **ANDERSON** told the UCA to text message him rather than continue communicating via Website A. The UCA gave **ANDERSON** an HSI recorded telephone number.

16. On May 12, 2020, **ANDERSON** continued communicating with the UCA

via text message from cellular telephone number 832-561-2574. The text messages exchanged were sent by **ANDERSON** to an HSI recorded telephone number. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
ANDERSON	5/12/2020	Gimme your full name n dob
ANDERSON	5/12/2020	What's the area you in?
ANDERSON	5/12/2020	...ima put north Dallas
ANDERSON	5/12/2020	Height
ANDERSON	5/12/2020	Weight
ANDERSON	5/12/2020	I just posted you
UCA	5/12/2020	Wut should I charge
ANDERSON	5/12/2020	...150 for qv ¹¹ 220 hr 300 hr

ANDERSON asked the UCA for his/her full name and date of birth. The UCA provided a date of birth once again confirming their age as sixteen years old. **ANDERSON** next asked the UCA's location, height, and weight for the commercial sex advertisement. **ANDERSON** confirmed he successfully posted the commercial sex advertisement online. **ANDERSON** instructed the UCA to charge one hundred fifty dollars for a

¹¹ "QV" is the abbreviation of the term "quick visit." "Quick visit" is a common term within the human trafficking subculture to refer to a commercial sex act in which the customer only stays long enough to ejaculate and leaves immediately afterwards.

“quick visit,” two hundred twenty dollars for one half hour, and three hundred dollars for a full hour.

POSTING OF COMMERCIAL SEX ADVERTISEMENT BY ANDERSON

17. On May 12, 2020, **ANDERSON** posted a commercial sex advertisement on www.adultsearch.com. The advertisement described the UCA as a nineteen-year-old “*female escort*” available for “*incall*”¹² and “*outcall*.”¹³ The advertisement listed the UCA as available for “*GFE*,”¹⁴ “*limited GFE*,” and described the UCA as possessing a “*bald kitty*.”¹⁵ The advertisement described the UCA as available to “*men, women and couples*.” The prices listed on the advertisement for “*in calls*” were two hundred fifty dollars for one hour or eight hundred dollars for “*all night*.” The prices listed on the advertisement for “*outcalls*” were three hundred dollars for one hour or one thousand dollars for “*all night*.” The advertisement directed responses to the HSI recorded telephone number previously provided to **ANDERSON** by the UCA. Throughout the day and evening of May 12, 2020, the UCA received multiple queries via text messages from commercial sex customers.

¹² “Incalls” is a common term within the human trafficking subculture used to describe when a commercial sex worker completes commercial sex acts within a residence or hotel room they already have reserved for the purpose. Customers come to their location to complete the commercial sex acts.

¹³ “Outcall” is a common term within the human trafficking subculture used to describe when a commercial sex customer is willing to travel to a location determined by the customer to complete commercial sex acts.

¹⁴ “GFE” is a common term within the human trafficking subculture used to refer to the “girlfriend experience.” The girlfriend experience refers to a commercial sex transaction in which the commercial sex customer completes intimate sex acts including kissing, cuddling and intercourse or oral sex without a prophylactic.

¹⁵ “Bald kitty” is a common term within the human trafficking subculture used to refer to when a female commercial sex worker has removed the pubic hair from her vagina.

CONTINUED COMMUNICATIONS BETWEEN ANDERSON AND UCAs

18. On May 12, 2020, **ANDERSON** continued communicating with the UCA via text messages from cellular telephone number 832-561-2574. The text messages exchanged were sent by **ANDERSON** to an HSI recorded telephone number. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
UCA	5/12/2020	I got a trick ¹⁶ wanting all night for 1000
ANDERSON	5/12/2020	I need to make sure you doing what you suppose to do and ok
ANDERSON	5/12/2020	Ok that's fine what time was he dropping you back off? Bekus if he keeps you longer than the expected time he needs to pay extra.
UCA	5/12/2020	Wut time should I tell him to bring me back
ANDERSON	5/12/2020	11.... 10 I meant
ANDERSON	5/12/2020	Let me know everything and every step so I can tell you yes or no
ANDERSON	5/12/2020	Make Daddy proud and be safe

The UCA told **ANDERSON** he/she had a commercial sex customer willing to pay one thousand dollars to spend the night with him/her. **ANDERSON** instructed the UCA to

¹⁶ "Trick" is a common term within the human trafficking subculture used to refer to commercial sex customers.

tell the commercial sex customer to bring him/her back by ten o'clock the next morning and make sure the customer paid extra if he wanted more time. **ANDERSON** instructed the UCA to let him “*know everything and every step*” so he could give permission.

19. On May 13, 2020, **ANDERSON** continued to communicate with the UCA. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
Slandokareem	5/13/2020	Do me a favor and unsend all those messages
slandokareem	5/13/2020	Now
Slandokareem	5/13/2020	Ok n unsend these...

In this exchange, **ANDERSON** instructed the UCA to delete all the messages previously exchanged between them over the messaging application within Website A.

CONTINUED COMMUNICATIONS BETWEEN ANDERSON AND UCAs

20. On May 13, 2020, **ANDERSON** continued to communicate with the UCA. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
UCA	5/13/2020	That trick last night only gave me 900 since he sent a uber 2 take me home
ANDERSON	5/13/2020	I have no time I repeat no time for foolishness and

		childish petty things. You are young so it's go be a lil different
ANDERSON	5/13/2020	Why you just now telling me that
ANDERSON	5/13/2020	I gotta make sure I'm making the right move with you taking the risk until birthday
UCA	5/13/2020	Wut about this 900 tho
ANDERSON	5/13/2020	Send it to me
UCA	5/13/2020	How much?
ANDERSON	5/13/2020	Wym ¹⁷ all of it
UCA	5/13/2020	So I don't get 2 keep none to spend?
ANDERSON	5/13/2020	No for and you only did 1 date don't insult my intelligence let's make sure you keep doing right and good by me and ima take kare of you like I said

In this exchange, the UCA told **ANDERSON** he/she only earned nine hundred dollars in commercial sex proceeds the previous evening because the customer paid for a ride sharing service. **ANDERSON** told the UCA he had “*no time for foolishness*” but acknowledged the UCA was “*young*” so it’s going to be “*a little different.*”

ANDERSON instructed the UCA to send the commercial sex proceeds to him. The

¹⁷ “WYM” is an abbreviation of the question “what do you mean?”

UCA asked if he/she could keep some of the proceeds, and **ANDERSON** told the UCA he/she could not.

21. On May 16, 2020, **ANDERSON** continued to communicate with the UCA. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
ANDERSON	5/16/2020	You haven't called me or communicated nothing I don't fuck around with shit like that and you've been having my money

ANDERSON expressed frustration with the UCA for not having sent him the commercial sex proceeds earned on May 13.

22. On May 19, 2020, **ANDERSON** continued to communicate with the UCA. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
UCA	5/19/2020	Yo I need ur info im goin....this morning
ANDERSON	5/19/2020	What all you need
UCA	5/19/2020	name and city and zipcode
ANDERSON	5/19/2020	Braxton Dean Houston Texas 77051
ANDERSON	5/19/2020	How are you getting to

UCA	5/19/2020	My friend givin me a ride so she let me use her ID to send
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In this exchange, the UCA told **ANDERSON** he/she needed information because he/she was ready to transfer the commercial sex proceeds. **ANDERSON** provided the name of a female in the city of Houston, Texas as the recipient. **ANDERSON** asked the UCA how he/she was getting to the money transfer service location. The UCA told **ANDERSON** he/she was getting a ride from a friend who would allow the UCA use her identification document to send the proceeds.

23. On May 19, 2020, **ANDERSON** continued to communicate with the UCA. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
ANDERSON	5/19/2020	You have to SHOW ME more
UCA	5/19/2020	I thought I jus had to earn 1500
ANDERSON	5/19/2020	Don't play with me I never said 1500
ANDERSON	5/19/2020	No at least 2500
ANDERSON	5/19/2020	Why the "fuck" do you insist on playing with me
ANDERSON	5/19/2020	It's been 4 hours since the next hour that you was suppose to send it

In this exchange, **ANDERSON** told the UCA he/she would have to earn two thousand five hundred dollars in commercial sex proceeds and pay it to him as a fee before he

would allow the UCA to join his HTO. **ANDERSON** expressed frustration with the UCA for delaying transfer of the nine hundred dollars in commercial sex proceeds.

24. On May 19, 2020, at approximately 3:01 p.m., **ANDERSON** communicated with the UCA via a telephone call on an HSI recorded telephone number. The following is a summary of the communications between **ANDERSON**, utilizing telephone number 832-561-2574, and the UCA utilizing an HSI recorded telephone number. This does not include every word exchanged.

25. The UCA apologized for having not yet transferred the commercial sex proceeds to **ANDERSON**. The UCA assured **ANDERSON** he/she still had the proceeds and had not spent any. **ANDERSON** expressed his frustration with the UCA, repeatedly calling him/her a “*bitch*.” **ANDERSON** yelled at the UCA to “*speak*” and explain to him why the proceeds had not yet been transferred to him. **ANDERSON** told the UCA “*bitch you need to do it tomorrow*.” **ANDERSON** told the UCA it had been a week since he/she earned the proceeds. **ANDERSON** asked about the UCA’s guardian. **ANDERSON** complained the UCA had not been selling commercial sex often enough and told the UCA to earn more proceeds. **ANDERSON** told the UCA he/she needed to earn more proceeds for him before he/she could join his HTO. **ANDERSON** told the UCA he/she needed to leave his/her guardian. **ANDERSON** finished the call by telling the UCA to send the proceeds to him and “*do not insult my intelligence or play some games*.”

TRANSFER OF COMMERCIAL SEX PROCEEDS TO ANDERSON

26. On May 21, 2020, HSI Special Agents transferred eight hundred fifty dollars to **ANDERSON** via the MoneyGram transfer service. The recipient of the transfer was “*Braxton Dean in Houston, TX.*”

CONTINUED COMMUNICATIONS BETWEEN ANDERSON AND UCAs

27. On May 21, 2020, **ANDERSON** continued to communicate with the UCA. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
UCA	5/21/2020	K I sent 850 to Braxton Dean the number is 66334390

The UCA told **ANDERSON** he/she transferred eight hundred fifty dollars in commercial proceeds to the name **ANDERSON** previously provided. The UCA provided **ANDERSON** with the unique reference number required to retrieve the transferred funds.

28. On May 21, 2020 at approximately 5:42 p.m., **ANDERSON** communicated with the UCA via a telephone call on an HSI recorded telephone number. The following is a summary of the communications between **ANDERSON**, utilizing telephone number 832-561-2574 and the UCA utilizing an HSI recorded telephone number. This does not include every word exchanged.

29. **ANDERSON** asked the UCA why he/she took so long to call him.

The UCA asked **ANDERSON** “*did you get my money?*” **ANDERSON** corrected the UCA “*you mean my money.*” **ANDERSON** then confirmed he received the commercial sex proceeds.

30. On May 22, 2020, at approximately 5:41 p.m., **ANDERSON** communicated with the UCA via a telephone call on an HSI recorded telephone number. The following is a summary of the communications between **ANDERSON**, utilizing telephone number 832-561-2574, and the UCA utilizing an HSI recorded telephone number. This does not include every word exchanged.

31. **ANDERSON** chastised the UCA for not selling commercial sex more often. **ANDERSON** told the UCA he had to be able to trust him/her because “*you are young, and I could get in trouble.*” **ANDERSON** told the UCA “*your birthday is coming*” and “*it’s three months until I can legally fuck with you.*” **ANDERSON** told the UCA he would bring him/her to sell commercial sex under his direction. **ANDERSON** told the UCA, “*You stay down. It’s not only paying or making sure you paying. To me it’s about loyalty. It’s about consistency.... I don’t want to run through thirty hoes I just want a couple. I want straight hoes...loyal. It’s cool to be on a blade but it’s cool to be on a blade for advertisement..... I don’t work the blade I send you to the blade for advertisement and it works.*” The UCA expressed fear about working on “*the blade*” and being murdered. **ANDERSON** told the UCA, “*the only person you have to worry about murdering you is me... you heard what I said? The only person you have to worry about*

murdering you is me.” ANDERSON told the UCA, “I need you to protect me at all costs... Only way you should worry is if you aren’t doing what you’re supposed to be doing. Don’t try no snake shit no sneaky shit never lie to me don’t ever lie to me about nothing. I hate fucking liars don’t fucking lie to me about a bitch ass thing. I am going to find out and when I find out I am not going to ask you why you lied to me. I’m just going to go fucking crazy.” ANDERSON completed the call by telling the UCA to speak to him every other day on the phone. The UCA told ANDERSON, “I’ll try.”

ANDERSON corrected the UCA, telling him/her, “I like ‘Yes Daddy I will’ not I’ll try.”

CONTINUED COMMUNICATIONS BETWEEN ANDERSON AND UCAs

32. On May 23, 2020, ANDERSON continued to communicate with the UCA. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
ANDERSON	5/23/2020	Why the fuck would you tell somebody you don’t know our business???
ANDERSON	5/23/2020	You a stupid ass hoe for that
ANDERSON	5/23/2020	PROTECT ME AT ALL COST
ANDERSON	5/23/2020	DATS DANGEROUS YOU DON’T KNOW IF THAT’S THE POLICE OR WHAT
ANDERSON	5/23/2020	I’ll kill you myself if you ever do some like that again

ANDERSON	5/23/2020	DON'T EVER FORGET IT FROM THIS POINT ON EVER IN YOUR FUCKIN LIFE
ANDERSON	5/23/2020	IM NOT PLAYING
ANDERSON	5/23/2020	...delete all these fukkkkk messages
ANDERSON	5/23/2020	Go unsend them Instagram messages and delete them
ANDERSON	5/23/20	Police are on instagram too

In this exchange, **ANDERSON** began text messaging the UCA after the user of an account bearing the username “*Braxton Dean*”¹⁸ contacted him/her on Website A.

ANDERSON expressed anger that the UCA had spoken to someone else about him and warned the UCA the account could have been law enforcement. **ANDERSON** threatened to kill the UCA if he/she ever committed a similar infraction. **ANDERSON** instructed the UCA to delete all of the messages exchanged.

33. On May 29, 2020, **ANDERSON** continued to communicate with the UCA. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
ANDERSON	5/29/2020	I need you to get down on a date or two so I can come get you
ANDERSON	5/29/2020	I don't need your sister thinking you ran away

¹⁸ “Braxton Dean” is the name the UCA was instructed to transfer eight hundred fifty dollars in commercial sex proceeds to on May 21, 2020.

		sending police after you
UCA	5/29/2020	I'm not telling her the real truth about leavin wit a pimp....

In this exchange, **ANDERSON** told the UCA he needed her to complete additional commercial sex acts before he came to pick him/her up on the night of May 29, 2020.

ANDERSON expressed concern the UCA's guardian would call the police after he/she left. The UCA reassured **ANDERSON**, telling him that he/she would not tell his/her guardian the "*real truth about leavin wit a pimp.*"

34. On May 29, 2020, **ANDERSON** continued to communicate with the UCA. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
UCA	5/29/2020	K this trick want an hour so I should get some \$\$\$
ANDERSON	5/29/2020	Yea for how much
UCA	5/29/2020	I told him 300 but he seem stupid...
ANDERSON	5/29/2020	Try to talk him out of more when he get there
ANDERSON	5/29/2020	...daddy need it all

The UCA sent text messages throughout the evening of May 29, 2020, to **ANDERSON**, informing him about the commercial sex acts completed and proceeds collected.

ANDERSON encouraged the UCA to earn additional proceeds to turn over to him.

35. On May 29, 2020, at approximately 6:48 p.m., **ANDERSON** communicated with the UCA via a telephone call on an HSI recorded telephone number. The following is a summary of the communications between **ANDERSON**, utilizing telephone number 832-561-2574 and the UCA utilizing an HSI recorded telephone number. This does not include every word exchanged.

36. **ANDERSON** asked how much the UCA had earned in commercial sex proceeds. **ANDERSON** asked for the UCA's address and told the UCA he was sending a driver to pick him/her up. **ANDERSON** told the UCA the driver would transport him/her to him.

37. On May 29, 2020, **ANDERSON** continued to communicate with the UCA. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
UCA	5/29/2020	Wtf up wit this uber
ANDERSON	5/29/2020	He's my driver not a Uber

ANDERSON confirmed that the person sent to pick up the UCA was someone known to him and not an employee of a ride sharing service.

38. On May 29, 2020, at approximately 9:14 p.m., 10:24 p.m., and 10:25 p.m., **ANDERSON** communicated with the UCA via three telephone calls on an HSI recorded telephone number. The following is a summary of the communications between

ANDERSON, utilizing telephone number 832-561-2574 and the UCA utilizing an HSI recorded telephone number. This does not include every word exchanged.

39. **ANDERSON** told the UCA to “*make sure you have that money for me.*”

ANDERSON gave the UCA updates about the driver’s progress and described the driver’s vehicle as a Cadillac.

ARREST OF DRIVER SENT BY ANDERSON TO TRANSPORT UCA

40. On May 29, 2020, at approximately 10:28 p.m. the driver of the Cadillac sent to pick up the UCA and transport him/her to **ANDERSON** was placed under arrest by HSI Special Agents.

CONTINUED COMMUNICATIONS BETWEEN ANDERSON AND UCAs

41. On May 29, 2020, **ANDERSON** continued to communicate with the UCA. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
UCA	5/29/2020	I ain’t ridin with this guy he look like he gonna take the money from me
ANDERSON	5/29/2020	Wtf bitch
ANDERSON	5/29/2020	Do what I tell you
ANDERSON	5/29/2020	Got damn you fucking up my business
ANDERSON	5/29/2020	Bitch get yo ass in that kar

ANDERSON	5/29/2020	This man on my payroll
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In this exchange, the UCA told **ANDERSON** he/she did not want to get into the vehicle with **ANDERSON**'s driver. **ANDERSON** instructed the UCA to get in the vehicle and confirmed the driver worked for him.

42. On May 29, 2020, at approximately 11:55 p.m. and 11:59 p.m., **ANDERSON** communicated with the UCA via two telephone calls on an HSI recorded telephone number. The following is a summary of the communications between **ANDERSON**, utilizing telephone number 832-561-2574 and the UCA utilizing an HSI recorded telephone number. This does not include every word exchanged.

43. **ANDERSON** screamed at the UCA, "*Get in the fucking car..... Get in the fucking car he is bringing you to me.... You are pissing me off.... Get in the fucking car so he can bring you to me.*" **ANDERSON** told the UCA if he/she did not get in the car then he would not bring him/her to work for him. The UCA agreed and told **ANDERSON**, "*I made my money so you can do your thing.*" **ANDERSON** called back and told the UCA he was going to send his cousin to come get the commercial sex proceeds. The UCA told **ANDERSON** no. **ANDERSON** threatened the UCA "*he is going to come knock on your fucking door..... you need to think about what you are saying.*" The UCA terminated the call with **ANDERSON**.

44. On May 30, 2020, **ANDERSON** continued to communicate with the UCA.

The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
ANDERSON	5/30/2020	When you go be up so I kan kome gets mine
UCA	5/30/2020	...u can't come here
ANDERSON	5/30/2020	So you need to leave or go put the money somewhere so I kan get bekus you had me spend unnecessary money yesterday and you didn't follow my instructions so where you go put it
UCA	5/30/2020	I think u just gonna take my money tho
ANDERSON	5/30/2020	If you don't tighten up your go end up being a choosy Susie ¹⁹ or getting beaten up this whole time
ANDERSON	5/30/2020	But once *again I need to pick up mines you already violated and disrespected so you need try to smooth this out as much as possible so where you go put it so I can get it now?
ANDERSON	5/30/2020	The worst thing you kan do is disrespect me
ANDERSON	5/30/2020	I need that today

¹⁹ "Choosy Susie" is a common term within the human trafficking subculture to refer disparagingly to trafficking victims who frequently switch between traffickers.

In this exchange, **ANDERSON** asked when he could come retrieve the commercial sex proceeds from the UCA. The UCA told **ANDERSON** he could not come. **ANDERSON** told the UCA that he/she need to put the commercial sex proceeds somewhere he could retrieve them. **ANDERSON** told the UCA he/she was going to end up “*getting beaten up this whole time.*” **ANDERSON** told the UCA he/she had disrespected him, and he needed the commercial sex proceeds that day.

45. On May 30, 2020, **ANDERSON** continued to communicate with the UCA. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
UCA	5/30/2020	I can't do this today
ANDERSON	5/30/2020	I'm already on the road your not making me waste money again I'm not having that
UCA	5/30/2020	Well I ain't gonna be there
ANDERSON	5/30/2020	You crossing the line....and disrespected me
UCA	5/30/2020	I aint disrespecting you I can do it Tuesday when I get back
ANDERSON	5/30/2020	Kall my phone
UCA	5/30/2020	I cant rite now u just gonna yell at me anyway
ANDERSON	5/30/2020	I got your address tho....I show you better than I kan tell you

UCA	5/30/2020	U can't just come there....u just bullshittin now
ANDERSON	5/30/2020	Did you forget he picked you up he seen what door you kame out of.... I said what I said and I meant what I said

The UCA told **ANDERSON** not to come and he/she would not meet him. **ANDERSON** told the UCA he/she had crossed the line and disrespected him. The UCA told **ANDERSON** to meet on Tuesday instead. **ANDERSON** threatened the UCA telling him/her *"I got your address tho...I show you better than I kan tell you."* The UCA expressed skepticism that **ANDERSON** would come to his/her residence. **ANDERSON** threatened the UCA again, reminding him/her that his driver had been to the residence the night before and knew where the UCA lived. **ANDERSON** warned the UCA, *"I said what I said and I meant what I said."*

46. On May 30, 2020, **ANDERSON** continued to communicate with the UCA. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
UCA	5/30/2020	Wut time? I'm going 2 try 2 get my friend to take me back
ANDERSON	5/30/2020	GPS estimated time is 4:45
UCA	5/30/2020	K I try 2 be there

ANDERSON	5/30/2020	And bitch I'm going to be there play with me if you want see you in a few
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In this exchange, the UCA agreed to meet with **ANDERSON**. **ANDERSON** updated the UCA on his travel schedule. **ANDERSON** threatened the UCA again, telling him/her that if he/she played with him then he would “*see you in a few.*”

47. On May 30, 2020, at approximately 4:26 p.m., 7:12 p.m., 7:45 p.m., and 7:53 p.m., **ANDERSON** communicated with the UCA via telephone calls on an HSI recorded telephone number. The following is a summary of the communications between **ANDERSON**, utilizing telephone number 832-561-2574 and the UCA utilizing an HSI recorded telephone number. This does not include every word exchanged.

48. **ANDERSON** told the UCA to make sure he/she was ready. **ANDERSON** told the UCA, “*don’t play with me because I drove all the way out here for this.*” **ANDERSON** called multiple times to update the UCA on his progress towards the UCA’s address. **ANDERSON** called to tell the UCA he had arrived and was parked in front of the address.

ARREST OF ANDERSON

49. On May 30, 2020, at approximately 7:50 p.m., HSI Special Agents observed a dark colored sedan driven by **ANDERSON** arriving at the address previously provided by the UCA. HSI Special Agents maintained surveillance on the vehicle as a black male, later identified as Alex WEST exited the vehicle and entered the rear passenger seat. **ANDERSON** proceeded to drive slowly into an apartment complex.

HSI Special Agents and Officers from the Lewisville Police Department followed **ANDERSON** into the apartment complex. The vehicle was stopped, and **ANDERSON** was placed under arrest.

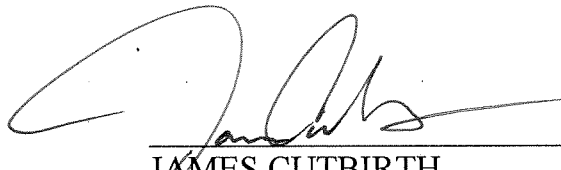
INTERVIEW OF ANDERSON

50. On May 30, 2020, at approximately 9:05 p.m., **ANDERSON** waived his Miranda rights and agreed to make a statement to two HSI Special Agents. **ANDERSON** stated that the purpose of his trip on May 30, 2020, was to pick up a female he previously met on Website A and transport her back to Austin, Texas. **ANDERSON** stated that he knew the female was engaged in the sale of commercial sex and he had previously posted commercial sex advertisements for her. **ANDERSON** stated that he received a payment of eight hundred dollars from the female for posting the commercial sex advertisements. **ANDERSON** stated that he picked up the money from a Walmart in Houston with his girlfriend "*Braxton*."

CONCLUSION

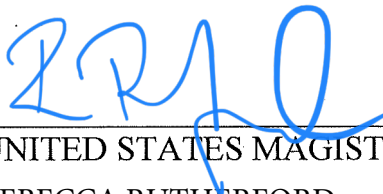
20. Based on the foregoing facts and circumstances, I respectfully submit that there is probable cause to believe that between April 24, 2020, and May 30, 2020, in the Dallas Division of the Northern District of Texas and elsewhere, **JaCorey Nathaniel ANDERSON** committed the offense of Attempted Child Sex Trafficking in violation of 18 U.S.C. §§ 1594(a), 1591(a) & (b)(2).

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'James Cutbirth', written over a horizontal line.

JAMES CUTBIRTH
Special Agent
Homeland Security Investigations

Signature confirmed via reliable electronic means on June 2, 2020, pursuant to Fed. R. Crim. P. 4.1.

A handwritten signature in blue ink, appearing to read 'Rebecca Rutherford', written over a horizontal line.

UNITED STATES MAGISTRATE JUDGE
REBECCA RUTHERFORD